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*Attorneys for Defendant
Medco Health LLC*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

NAMIT BHATNAGAR, an individual,

Plaintiff,

v.

MEDCO HEALTH, LLC, a foreign Limited
Liability Company doing business in Nevada
DOES I through X and ROES I through X,

Defendants.

Case No.: 2:11-cv-00914-PMP-LRL

**DEFENDANT MEDCO HEALTH
LLC'S MOTION TO EXTEND TIME
TO ANSWER OR OTHERWISE
RESPOND TO PLAINTIFFS'
COMPLAINT**

(First Request)

Pursuant to LR 6-1, Defendant Medco Health LLC, ("Defendant") submits the following Motion to Extend Time to Answer or Otherwise Respond to Plaintiff Namit Bhatnagar's ("Plaintiff") Complaint. This motion is submitted and based on the following:

1. That this is the first request for an extension of time for Defendant to file its answer or otherwise respond to Plaintiff's Complaint.

2. That Defendant's answer to Plaintiff's Complaint is currently due on Monday, June 13, 2011.

CERTIFICATE OF SERVICE

Pursuant to Special Order #109, counsel of record registered for the CM/ECF system have been served with the foregoing **MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT** by electronic means. In addition, pursuant to Fed. R. Civ. P. 5(b), I hereby certify that the service of the same was made this day by depositing a true copy of the same for mailing at Las Vegas, Nevada, addressed to:

Namit Bhatnagar
273 Great Duke Avenue
Las Vegas, NV 89183

Dated this 13th day of June, 2011.

/s/ Rae J. Christakos
An employee of JACKSON LEWIS LLP